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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

OANDA CORPORATION, }
Plaintiff, } Civil Action No. 20-05784-BRM-
v. } DEA
GAIN CAPITAL HOLDINGS, INC., and }
GAIN CAPITAL GROUP, LLC, }
Defendants. } **DECLARATION OF NATALIE J.
MORGAN IN SUPPORT OF
DEFENDANTS' REPLY BRIEF IN
SUPPORT OF MOTION TO STAY
PENDING COVERED BUSINESS
METHOD REVIEWS**
} *Document Filed
Electronically*

I, Natalie J. Morgan, declare as follows:

1. I am an attorney at Wilson Sonsini Goodrich & Rosati P.C. and am counsel for Defendants GAIN Capital Holdings, Inc. and GAIN Capital Group, LLC (“Defendants”). I make this Declaration based on my personal knowledge

and in support of Defendants' Reply Brief in Support of Motion to Stay Pending Covered Business Method Reviews.

2. Attached as **Exhibit A** is a true and correct copy of a webpage titled, *Trial Statistics Archive, USPTO.gov*, which can be accessed at:
<https://www.uspto.gov/patents-application-process/patent-trial-and-appeal-board/statistics/aia-trial-statistics-archive>.

3. Attached as **Exhibit B** is a true and correct copy of a document titled, "Trial Statistics IPR, PGR, CBM: Patent Trial and Appeal Board September 2020," *USPTO.gov*, which can be accessed at:

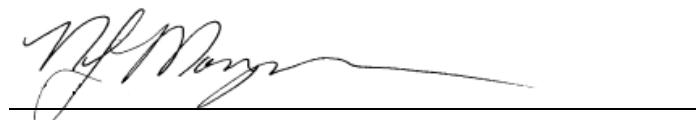
https://www.uspto.gov/sites/default/files/documents/trial_statistics_20200930.pdf.

4. Attached as **Exhibit C** is a true and correct copy of a printout from Lex Machina, which shows the case list for CBM PTAB trials filed between January 1, 2012 and September 15, 2020. The printout can be accessed at:

https://law.lexmachina.com/ptab/?trial_types-include=205&filing_date-from=2011-01-02&filing_date-to=2020-09-16&filters=true&tab=trial_resolutions&view=analytics&cols=9243.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 12th day of October 2020.



Natalie J. Morgan